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September 22, 2016

Waiver to allow the 50% approval

CC Docket No. 02-6

**Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554**

To whom it may concern;

**Appellant Name: Cricky Cirillo, consultant for applicant.
Applicant: St. Ann School
Applicant BEN #: 11096
Applicant Form 471 #: 1050274**

St. Ann was filed individually on the Form 471. When we realized St. Ann should have been under the Catholic School Region of Central Westchester an appeal was filed. The appeal was approved and USAC changed the 40% to 50% on their Commitments page but the dollar amount was not changed to reflect the 50%. We contacted USAC to make the change and they were unable to. They told us a waiver with the FCC needed to be filed before USAC could make the correction. We respectfully request that you approve the waiver so USAC can make the change to the approved dollar amount, reflecting the 50% approval percent not the 40% approval percent for St. Ann School.

Respectfully,

**Cricky Cirillo, for Richard Senturia, Consultant
Consulting Number 16048902
9666 Olive Blvd, Suite 215
Olivette, MO 63132
314-282-3675 direct line
314-395-5882 fax
cricky@erateprogram.com**

471 Application Number	Applicant FRN	Applicant Name	BEN	SPIN	Service Provider Name	Commitmen t Status	FCDL Comment	486 SSD	Cmtd FRN Service Type	Committed Amount	Cmtd Discount	Invoicing Mode	Total Authorized Disbursement
1013510	2750412	ST ANN SCHOOL	11096	143001192	AT&T Corp.	FUNDED	Based on the applicant's request, Catholic School Region of Central Westchester, BEN 16085432 has been added to the Discount Section as the Parent Entity with Child entities to support the shared discount for the region rather than the individual filing by the school entity. As a result, the shared discount percentage was increased to 50% discount level that could be validated based on third party data.	7/1/2015	VOICE SERVICES	\$135.04	30	BEAR	\$121.53
1050274	2868183	ST ANN SCHOOL	11096	143045321	RC Technology Services, Inc.	FUNDED	Based on the applicant's request, Catholic School Region of Central Westchester, BEN 16085432 has been added to the Discount Section as the Parent Entity with Child entities to support the shared discount for the region rather than the individual filing by the school entity. As a result, the shared discount percentage was increased to 50% discount level that could be validated based on third party data.	7/1/2015	INTERNAL CONNECTION	\$11,208.00	50	SPI	\$11,208.00
1013510	2750419	ST ANN SCHOOL	11096	143007246	Cablevision Systems Corporation (Education Dept)	FUNDED	Based on the applicant's request, Catholic School Region of Central Westchester, BEN 16085432 has been added to the Discount Section as the Parent Entity with Child entities to support the shared discount for the region rather than the individual filing by the school entity. As a result, the shared discount percentage was increased to 50% discount level that could be validated based on third party data.	7/1/2015	ACCESS	\$474.00	50	NOT SET	\$909.65
1013510	2750409	ST ANN SCHOOL	11096	143001359	Verizon New York Inc.	FUNDED	Based on the applicant's request, Catholic School Region of Central Westchester, BEN 16085432 has been added to the Discount Section as the Parent Entity with Child entities to support the shared discount for the region rather than the individual filing by the school entity. As a result, the shared discount percentage was increased to 50% discount level that could be validated based on third party data.	7/1/2015	VOICE SERVICES	\$1,044.00	30	SPI	\$909.65

approved 50%

this is the
40% approved
amount



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LETTER OF APPEAL

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

To whom it may concern;

Appellant Name: Richard Senturia, consultant for applicant.

Applicant:

St. Ann School	11096
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We are appealing the Funding Decision Commitment Letter for the above client school and seek CORRECTIONS of the discount calculation for all of their 2015-16 FRN's from their individual E-Rate discount levels to the correct average discount level of their Central Administrative Agency.

When originally filed, the school's funding was determined through individual discount levels. After completing the filings for the school, and upon reaching the PIA Review stage, we discovered that the school was actually part of a Central Administrative Agency named "**Catholic School Region of Central Westchester, BEN 16085432**" and therefore the school's discount level should have been calculated using the CAA's aggregate data.

This "Regional/CAA" status was unknown to us prior to this discovery. Immediately upon this discovery, we contacted USAC looking for guidance. This letter reflects the guidance provided. We ask you to add "**Catholic School Region of Central Westchester, BEN 16085432**" as a NIF to the Form 471, and to adjust the approved discount level of the school to reflect the discount level of "**Catholic School Region of Central Westchester**" of **50%**, as shown below.

(ORIGINALLY FILED) -

SCHOOL	BEN	APPLICANT FORM 471 (Cat 1-FCDL Received)	Individual Enrollment	Individual Low Income	Individual E- Rate Discount
St. Ann School	11096	1050274	188	18	40%

New discount

SCHOOL	BEN	CAA	CAA Enrollment	CAA Low Income	CAA E-Rate Discount
St. Ann School	11096	Catholic School Region of Central Westchester	3438	725	50%

Please find attached the following documentation:

1. The "Charter" of **Catholic School Region of Central Westchester, BEN 16085432** which delineates all of the schools that are part of this CAA.
2. A Letter of Agency
3. A Spreadsheet showing all of the CAA schools and the enrollment & low income data of the CAA.

Respectfully,

Richard Senturia

PLEASE add the BEN, shown below, as a NIF to this Application.

The discount level for this school should be adjusted to reflect the discount level of their Central Administrative Agency - Catholic School Region of Central Westchester

Billed Entity Number	Entity Name	Urban/Rural	Total Number of Students Enrolled in Region	Total Number of Students in Region Eligible for NSLP	Percentage of Students in Region Eligible for NSLP	Discount Rate
16085432	Catholic School Region of Central Westchester	U	3449	895	26%	50%